



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

Dr. Nelmon Oliveira da Costa
Director, Department of Inspection
for Products of Animal Origin
Ministry of Agriculture and Provisions
Division of International Commerce Control
Ministry of Agriculture Annex
Block D, 4th Floor, Room 436A
70043-900 Brasilia DF, Brazil

DEC 13 2005

Dear Dr. Costa:

The Food Safety and Inspection Service (FSIS) conducted an on-site enforcement audit of Brazil's meat inspection system July 7 through July 27, 2005. Comments from Brazil have been included as an attachment to the final report. Enclosed is a copy of the final report.

If you have any questions regarding the FSIS audit or need additional information, please contact me at telephone number (202) 720-3781, at (202) 690-4040 or electronic mail at sally.white@fsis.usda.gov.

Sincerely,

Sally White, Director
International Equivalence Staff
Office of International Affairs

Enclosure

cc:

Alan Hraspsky, Agricultural Counselor, US Embassy, Brasilia

Colleen Magro, Trade Specialist, Embassy of Brazil

Robert Macke, Assistant Deputy Administrator, ITP, FAS

Jeanne Bailey, FAS Area Officer

Barbara Masters, Administrator, FSIS

Linda Swacina, Executive Director, FSIA, OIA

Amy Winton, State Department

Karen Stuck, Assistant Administrator, OIA

William James, Deputy Asst. Administrator, OIA

Donald Smart, Director, Program Review, OPEER

Sally White, Director, IES, OIA

Clark Danford, Director, IEPS, OIA

Mary Stanley, Director, IID, OIA

Armia Tawadrous, Senior Policy Advisor, OIA, FSIS

AJ Ogundipe, IES, OIA

Country File

FINAL

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FINAL REPORT OF AN ENFORCEMENT AUDIT CARRIED
OUT IN BRAZIL COVERING BRAZIL'S MEAT INSPECTION
SYSTEM

July 7 through July 27, 2005

Food Safety and Inspection Service
United States Department of Agriculture

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ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority
DFA	Delegate for Federal Agriculture Office at State Level
DIPOA	Department of Animal Product Inspection
<i>E. coli</i>	<i>Escherichia coli</i>
FSIS	Food Safety and Inspection Service
MAPA	Ministry of Agriculture, Livestock and Supply
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Point Systems
<i>Salmonella</i>	<i>Salmonella</i> species
SDA	Agriculture and Livestock Defense Secretariat
SIPA	Animal Product Inspection Service
SPS	Sanitation Performance Standards
SSOP	Sanitation Standard Operating Procedures

1. INTRODUCTION

The audit took place in Brazil from July 7 through July 27, 2005.

An opening meeting was held on July 7, 2005, in Sao Paulo with the Central Competent Authority (CCA), which is the Department of Animal Product Inspection (Departamento de Inspeção de Produtos de Origem) (DIPOA). At this meeting, the Food Safety and Inspection Service (FSIS) audit team confirmed the objective and scope of the audit, the audit itineraries, and requested additional information needed to complete the audit of Brazil's meat inspection system.

The audit team was accompanied during the entire audit by representatives from DIPOA and/or representatives from the Animal Product Inspection Service (Serviço de Inspeção de Produtos de Origem Animal) (SIPA).

2. OBJECTIVE OF THE AUDIT

This audit was the second follow-up audit to the enforcement audit that was conducted in March/April 2005. The objective of the audit was to determine if Brazil had implemented corrective actions with regard to government oversight, in the eight establishments selected for audit, in the five microbiological laboratories selected for audit, and in the six residue laboratories selected for audit.

In pursuit of the objective, the following sites were visited: the headquarters(temporarily moved to Sao Paulo) of DIPOA, four SIPA offices located in four Federal Agriculture Offices at the State Level (Mato Grosso, Mato Grosso do Sul, Goias, and Sao Paulo), six residue testing laboratories (three government and three private labs), five microbiological testing laboratories (one government and four private labs), two meat processing establishments, and six slaughter and processing establishments. Five (421, 504, 2979, 3181, 4507) out of eight establishments selected were not audited during the March/April enforcement audit.

Competent Authority Visits			Comments
Competent Authority Visit	Headquarters	1	Brasilia
	SIPA	4	Federal Agric Offices at State level
Residue Laboratories		6	
Microbiology Laboratories		5	
Meat Processing Establishments		2	
Meat Slaughter and Processing Establishments		6	

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA and SIPA officials to assess the implementation of strategic plans that were developed and presented during the June 2005 audit. The second part involved an audit of a selection of records at the CCA and four SIPA offices. The third part involved on-site visits to eight establishments selected by the CCA: six slaughter and processing establishments, and two processing establishments. The fourth part involved visits to five microbiology laboratories (one government and four private labs) and six residue laboratories (three government and three private labs) selected by the CCA. These laboratories provide laboratory support for the eight establishments selected by the CCA.

Program effectiveness determinations of Brazil's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP) and Sanitation Performance Standards (SPS), (2) animal disease controls, including the requirements for Bovine Spongiform Encephalopathy, (3) slaughter/processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems a testing program for generic *E. coli* and a testing of Ready to Eat Products, (4) residue controls, and (5) enforcement controls, including a testing program for *Salmonella* in raw products, daily inspection, monthly reviews, and inspection system controls.

The audit team assessed the CCA's implementation of strategic plans that were developed and presented during the June 2005 audit by evaluating these five risk areas. In addition, the audit team focused on whether CCA had the ability to implement FSIS laboratory methodologies and procedures, had effective oversight of laboratories, and had corrected deficiencies identified during the March/April audit.

During all on-site establishment visits, the audit team evaluated the nature, extent and degree to which findings impacted on food safety and public health. The audit team also assessed how inspection services are carried out by the government of Brazil and determined if establishment and inspection system controls were in place to ensure that the meat products exported to the United States are safe, unadulterated and properly labeled.

At the opening meeting, the team leader explained to the CCA officials that Brazil's meat inspection system would be audited against two standards: (1) FSIS regulatory requirements and (2) any equivalence determinations made for Brazil. FSIS requirements include, among other things, daily inspection in all certified establishments, supervisory monthly reviews of certified establishments, humane handling and slaughter of animals, ante-mortem inspection of animals and post-mortem inspection of carcasses and parts, the handling and disposal of inedible and condemned materials, sanitation of facilities and equipment, residue testing, species verification, and requirements for HACCP, SSOP,

and testing for generic *E. coli*, *Salmonella*, and government oversight/enforcement activities.

Equivalence determinations are those that have been made by FSIS for Brazil under provisions of the Sanitary/Phytosanitary Agreement. Brazil has adopted the FSIS regulatory requirement for *Salmonella* testing for raw products with the exception of the following equivalent measures:

1. Establishment employees collect samples.
2. Private laboratories analyze samples.
3. An establishment is suspended the first time it fails to meet a *Salmonella* performance standard.

4. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to end), which include the U.S. import requirements listed in 9 CFR 327 and the Pathogen Reduction/HACCP regulations.

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at the following address:
http://www.fsis.usda.gov/Regulations_&_Policies/Foreign_Audit_Reports/index.asp

During the March/April 2005 enforcement audit, significant, serious deficiencies were found in all aspects of government oversight, payment of inspectors, conflict of interest issues, laboratory operations, and establishment operations. As a result, Brazil voluntarily suspended all its establishments certified for export to the United States in April 2005.

FSIS conducted a follow-up audit of Brazil's meat inspection system in June 2005. Brazil has developed new inspection policies and procedures in its strategic plans by adopting FSIS Directive 5000.1, rev 1. However, it was found that Brazil has not implemented the new inspection procedures. FSIS was unable to measure the implementation of these procedures during the June 2005 audit. In the two microbiology laboratories audited, Brazil did not provide appropriate oversight to ensure that FSIS methods were being used to analyze U.S. samples for *Listeria monocytogenes* and *Salmonella*. Methods for detecting and confirming *Listeria monocytogenes* and *Salmonella* are not currently approved. No deficiencies were observed in the six establishments audited. All six establishments had implemented corrective actions to address the deficiencies identified in the March/April 2005 audit.

6. MAIN FINDINGS

6.1 Government Oversight

DIPOA is under the umbrella of the Ministry of Agriculture, Livestock and Supply (Ministério da Agricultura, Pecuária e Abastecimento (MAPA)). The Director, DIPOA reports to the office of the Agriculture and Livestock Defense Secretariat (Secretaria de Defesa Agropecuária (SDA)) which is equivalent to USDA's Under Secretary for Food Safety. DIPOA, Brazil's CCA, is responsible for providing government oversight of Brazil's meat inspection program. The International Export and Import Programs Coordination Division is one of the offices in DIPOA and it has broad responsibility: develop and manage export and import programs and policies including auditing procedures and certification of new establishments; manage the regulation and rule making process; develop and manage field implementation strategies for FSIS food safety requirements; and coordinate field inspection activities nationwide.

Each state in Brazil has a Delegate for the Federal Agriculture Office at the State Level (Delegacia Federal de Agricultura do Estado (DFA)). Federal Delegates, also referred to as Federal Superintendents, are political appointees of the Minister of Agriculture.

6.1.1 CCA Control Systems

The CCA has revised its organizational structure to provide direct oversight of the laboratories and to ensure appropriate methodology is being used. The CCA has established a new position that reports to the CCA, the Special Assistant for Programs of Residues and Microbiology for Exported Meat Products. It appears that the CCA will be able to provide direct oversight of the laboratories if this office exercises the authority and performs the duties and functions as planned.

6.1.2 Ultimate Control and Supervision

DIPOA has ultimate control and supervision over its inspection program.

6.1.3 Assignment of Competent, Qualified Inspectors

As a result of the March/April enforcement audit findings, Brazil received about \$500,000 to improve its training programs. However, the CCA does not appear to have an effective training strategy to implement new inspection programs and FSIS laboratory methodologies and procedures. Although Brazil conducted emergency training in new inspection programs for four Federal state offices (including inspectors in eight establishments), the training was not effective. In the Federal state offices, officials did not demonstrate that a clear understanding and practical application of FSIS directive 5000.1.

6.1.4 Authority and Responsibility to Enforce the Laws

The sanitation, slaughter and processing inspection procedures and standards, and legal authority to enforce these requirements, are outlined and specified in a Brazil inspection

law referred to as RIISPOA in section 1.283, article 876. The CCA has the authority and responsibility to enforce the inspection laws, and it has developed new inspection policies and procedures by adopting FSIS inspection procedures to ensure effective enforcement of U.S. requirements in the eight establishments selected for review. Although elements of adopted FSIS inspection policies and procedures (FSIS Directive 5000.1, revision 1) were implemented, it is too early to generate enough documentation, such as inspection schedules, inspection verification records, and noncompliance records to measure the effectiveness of implementation.

6.1.5 Adequate Administrative and Technical Support

The CCA has established a new position that reports to the CCA, the Special Assistant for Programs of Residues and Microbiology for Exported Meat Products. It appears that the new Special Assistant Programs of Residues and Microbiology for Exported Meat Products will be able to provide direct oversight of the laboratories if the office exercises the authority and performs the duties and functions as planned. The CCA plans to implement the following FSIS analytical methods:

- FSIS MGL 4.03 (*Salmonella*) for both carcass samples and ready to eat samples.
- FSIS MLG 8.03 (*Listeria monocytogenes*) for ready to eat samples.
- AOAC 966.24 and AOAC 998.08 (generic *E. coli*) for carcass samples.

Although the CCA plans to implement FSIS laboratory methods and procedures, it has not implemented training for laboratory personnel. The laboratory personnel do not have a clear understanding of these methods and procedures. However, the CCA has signed a training contract with laboratory consultants to provide training in application and validation of FSIS laboratory methods and procedures.

6.2 Headquarters Audit

The audit team assessed the CCA's implementation of strategic plans that were developed and presented during the June 2005 audit. In pursuit of this, FSIS interviewed key officials specifically to verify whether the CCA has implemented a strategy: (1) to ensure an effective organizational structure and staffing that will result in uniform implementation of U.S. requirements, (2) that will result in effective control and supervision over official activities of all government employees, certified establishments, and laboratories testing product destined for U.S., (3) to ensure the assignment of competent, qualified inspectors that are paid by the government and receive no benefits from the establishments, (4) to enforce U.S. requirements, (5) to ensure adequate administrative and technical support to operate the inspection system. Various supporting records and documents related to inspection programs and policies were examined and verified to confirm CCA officials' responses.

6.3. Audit of SIPA and Local Inspection Sites

SIPA offices are responsible for direct implementation of U.S. requirements and inspection oversight activities over establishments certified for U.S. export. The audit

team conducted reviews of four SIPA offices to assess the effectiveness of delivery of newly developed inspection policies and programs and implementation strategies. In pursuit of this, FSIS interviewed key officials in four SIPA offices that are responsible for managing the delivery of inspection in eight establishments selected for audit. These were:

- SIPA Office in Cuiaba, Mato Grosso State
- SIPA Office in Campo Grande, Mato Grosso do Sul State
- SIPA Office in Goiana, Goias State
- SIPA Office in Sao Paulo, Sao Paulo State

Available supporting records and documents related to field inspection oversight activities were examined by the auditors. However, it was found that more time was needed for the Brazilian inspection system to generate sufficient records and documentation to verify effective implementation.

In addition, FSIS interviewed inspection officials assigned to one of these eight establishments selected for audit to determine whether (1) the CCA has trained inspection officials on how to implement the new inspection policies and programs, (2) inspection officials have a clear understanding of the new inspection policies and programs, and (3) inspection officials are competent and have necessary skills to properly execute the new inspection policies and programs. Although the CCA provided and conducted emergency training in new inspection programs, the training was not effective. The inspection officials did not demonstrate (1) a clear understanding and practical application of FSIS directive 5000.1, rev 1 (2) competency and skills to properly execute the new inspection programs.

7. ESTABLISHMENT AUDITS

Although it was agreed that the CCA would select establishments for audit that had implemented appropriate corrective actions to meet FSIS requirements, of the eight establishments audited, one received a Notice of Intent to Delist (NOID) for significant deficiencies in Sanitation Performance Standard requirements. No deficiencies that would affect food safety were observed in the remaining seven establishments.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During laboratory audits, emphasis was placed on the application of procedures and standards that are equivalent to United States requirements.

8.1 RESIDUE LABORATORY AUDIT

Residue laboratory audits focus on sample handling, sampling frequency, timely analysis data reporting, analytical methodologies, tissue matrices, equipment operation and printouts, detection levels, recovery frequency, percent recoveries, intra-laboratory check samples, and quality assurance programs, including standards books and corrective actions.

It was agreed that the CCA would select residue laboratories for audit that had implemented appropriate corrective actions to meet FSIS requirements. The CCA selected the following six residue laboratories:

- Lanagro (government lab) in Campinas
- Galeno LTD (private lab) in Campinas
- Microbioltico (private lab) in Campinas
- Lanagro (government lab) in Recife
- LADETEC (private lab) in Rio de Janeiro
- Lanagro (government lab) in Porto Alegre

No significant deficiencies were noted.

8.2 MICROBIOLOGY LABORATORY AUDIT

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check samples. If private laboratories are used to test U.S. samples, then FSIS evaluates compliance with the criteria established for the use of private laboratories under the FSIS PR/HACCP requirements.

It was agreed that the CCA would select microbiology laboratories for audit that had implemented appropriate corrective actions to meet FSIS requirements. The CCA selected the following five microbiology laboratories:

- SFDK (private lab) in Sao Paulo
- CERELAB (private lab) in Sao Paulo
- LACI (private lab) in Lins
- LARA (government lab) in Pedro Leopoldo
- Famato (private lab) in Cuiaba

Three of the five microbiology laboratories did not meet good laboratory practice requirements. The deficiencies are noted below:

SFDK, a private microbiology laboratory in Sao Paulo.

- One deficiency was observed:
 - Media preparation records did not include pH measurements for each batch.

CERELAB, a private microbiology laboratory in Sao Paulo.

- Four deficiencies were observed:
 - Media preparation records did not document autoclave time and temperature measurements for each batch.
 - Routine media preparation practices did not comply with autoclave time and temperature instructions for *Salmonella* testing media.
 - Error correction for working thermometers was neither considered nor documented for daily measurements.

- The working thermometer on the water bath incubation unit intended for future use with the FSIS MLG4.03 *Salmonella* method was not sufficiently accurate for that purpose.

FAMATO, a private microbiology laboratory in Cuiaba.

- Four deficiencies were observed:
 - Autoclave time and temperature measurements were not clearly traceable to other preparation records for each batch.
 - Documentation of working thermometer temperature measurements was not consistent and complete.
 - Error correction for working thermometers was neither considered nor documented for daily measurements.
 - The reference thermometer used for calibration of working thermometers was not fit for the intended purpose.

LACI, a private microbiology laboratory in Lins.

- No deficiencies were observed.

Lanagro, a government microbiology laboratory in Pedro Leopoldo.

- No deficiencies were observed.

9. SANITATION CONTROLS

As stated earlier, the FSIS focused on five areas of risk to assess Brazil's meat inspection system. The first of these risk areas that the audit team reviewed was Sanitation Controls.

9.1 Sanitation Standard Operating Procedures

All eight establishments selected for audit were evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the United States' domestic inspection program.

In two establishments, SSOP on-going requirements were not effectively implemented:

- Product residues from previous days' operations and grease were observed on food contact surfaces of hanging beef hooks in the shipping/receiving area.
- Establishment's corrective action record(s) did not include preventive measures to prevent recurrence of direct product contamination or adulteration including appropriate reevaluation and modification of SSOP.

9.2 Sanitation Performance Standards

All eight establishments selected for audit were evaluated to determine if the FSIS regulatory requirements for SPS were met according to the criteria employed in the United States' domestic inspection program.

Four establishments did not meet SPS requirements.

One establishment received a NOID for deficiencies in SPS requirements.

- Facilities were not properly maintained to prevent conditions that could lead to insanitary conditions, adulteration of products, and to preclude entrance of flies and vermin such as mice.
- Dust and debris were observed on electrical cables over exposed beef carcasses in the slaughter room.
- Holes, cracks, gaps, flaking paint, rust, and deteriorated and unprotected insulation were observed in different locations where exposed products were handled.
- Beaded condensate from overhead structures was observed in slaughter and carcass chilling rooms where exposed products were handled.
- Dripping water from overhead structures was observed in product shipping area and beef boning rooms where exposed products were handled.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS audit team reviewed was Animal Disease Controls. These controls include ensuring adequate animal identification, control over condemned and restricted product, implementation of the requirements for Bovine Spongiform Encephalopathy, and procedures for sanitary handling of returned and reconditioned product.

No deficiencies were observed.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS audit team reviewed was Slaughter/Processing Controls. The controls include the following areas: humane handling and slaughter of animals, ante-mortem inspection procedures; ante-mortem disposition; post-mortem inspection procedures; post-mortem disposition; ingredients identification; control of restricted ingredients; formulations; processing schedules; equipment and records; and processing controls of cured, dried, and cooked products.

The controls also include the implementation of HACCP systems in all establishments and implementation of a generic *E. coli* testing program in slaughter establishments, and a testing of Ready to Eat Products.

11.1 Humane Handling and Slaughter Procedure

No deficiencies were observed.

11.2 HACCP Implementation.

All eight establishments selected for audit were required to have developed and adequately implemented a HACCP program. Each of these programs was evaluated according to the criteria employed in the United States' domestic inspection program.

In one establishment, HACCP on-going requirements regarding recordkeeping were not met:

- HACCP records documenting the monitoring of CCPs did not include the recording of time, initials or signature.

11.3 Testing for Generic *E. coli*

Brazil has adopted the FSIS regulatory requirements for generic *E. coli* testing.

Six of the eight establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing and were evaluated according to the criteria employed in the United States' domestic inspection program.

No deficiencies were observed.

11.4 Testing of Ready to Eat Products

Eight establishments selected for audit were producing ready-to-eat products that are subject to the testing requirements for *Listeria monocytogenes* and *Salmonella*.

No deficiencies were observed.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS audit team reviewed was Residue Controls. These controls include sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions.

No significant deficiencies were observed.

13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS audit team reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements, the testing program for *Salmonella* in raw products, daily inspection, monthly reviews, and inspection system controls.

13.1 Daily Inspection in Establishments

No deficiencies were observed.

13.2 Testing for *Salmonella* in Raw Product

Six establishments were required to meet the basic FSIS regulatory requirements for *Salmonella* testing. Brazil has adopted the FSIS requirements for *Salmonella* testing with the exception of the following equivalent measures:

- Establishment employees collect *Salmonella* samples.
- Samples are analyzed in private laboratories.
- Brazil suspends an establishment the first time it fails to meet a *Salmonella* performance standard in raw product.

No deficiencies were observed.

13.3 Species Verification

Brazil is exempt from species verification testing and is following all controls to maintain the exemption.

13.4 Monthly Reviews

Deficiencies were observed in the supervisory monthly reports:

- Inspection officials did not follow-up by taking the necessary enforcement action when the establishment failed to implement corrective actions as scheduled.
- The CCA has not fully implemented its new supervisory monthly review procedures.

13.5 Inspection System Controls

The CCA was required to demonstrate that all government inspectors assigned to establishments certified for U.S. export were being paid by government. Serious deficiencies were observed in payment of inspectors and conflict of interest issues during the March/April 2005 enforcement audit. The CCA has corrective actions in place that include immediate and permanent solutions to resolve payment of inspector issues. Although the CCA still has contracted inspectors (inspectors working for and paid by municipal governments), it has implemented immediate corrective actions to resolve conflict of interest issues that were identified in the last enforcement audit. The CCA issued and sent circulars (policy memos) to all nine SIPAs. The circulars specifically address how SIPA chiefs should control, monitor, and manage payment of inspectors to eliminate conflict of interest issues. According to the circulars, SIPAs will be held responsible and accountable if they do not implement necessary controls to eliminate conflict of interest issues.

The CCA is tentatively scheduled to implement permanent solutions in 3-4 months when all inspectors will be paid by the Federal government of Brazil. The CCA's permanent solution in its strategic plan is to employ more Federal government inspectors to replace all contracted inspectors.

Controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within those countries, and the importation of only eligible meat products from other countries for further processing.

14. CLOSING MEETING

A closing meeting was held on July 27, 2005, in Sao Paulo with the CCA. At this meeting, the preliminary findings and conclusions from the audit were presented by the lead auditor.

The CCA understood and accepted the findings.

AJ Ogundipe
Lead Auditor

A handwritten signature in cursive script, appearing to read "AJ Ogundipe", is written over a horizontal line. The signature is positioned to the right of the typed name "AJ Ogundipe".

15. ATTACHMENTS

Individual Foreign Establishment Audit Forms
Foreign Country Response to Draft Final Audit Report

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Sadia S/A Varzea Grande Mato grosso	2. AUDIT DATE 07/08/2005	3. ESTABLISHMENT NO. SIF 2015	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, DVM	6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pack Skins/Moisture)		54. Ante Mortem Inspection	O
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	O
27. Written Procedures	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

Establishment # SIF 2015

Date: 07/08/2005

Processing Operation

There were no significant findings to report after consideration of the nature, degree and extent of all observations.

61. NAME OF AUDITOR

Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

 07/29/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Industria E Comercio de Carnes Minerva Ltda. Av. Antonio Manco Bernardes S/N Barretos, Sao Paulo	2. AUDIT DATE 07/11, 12/2005	3. ESTABLISHMENT NO. SIF 0421	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, DVM	6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	X	38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	X
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58. Notice of Intent to Delist (NOID)	X
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Establishment # 0421

Date: 07/11, 12/2005

Slaughter & Processing Operations

12/51. Product residues and grease from previous day's operation were observed on food contact-surfaces of beef hooks in the product shipping/receiving room. 9 CFR 416.15

39/51.a) Deteriorated and unprotected insulation over ducts and pipes was observed in the shipping room, carcass chillers, and slaughter room. 9 CFR 416.2 (b)

b) Flaking paint and rust was observed on overhead beams and supports in the shipping/receiving room and in the same room ceilings had flaking paint. 9 CFR 416.2 (b)

c) Accumulation of dust or debris was found on electrical cables over exposed beef carcasses in the slaughter room. 9 CFR 416.2 (b)

d) The drop ceiling panels were not properly installed to assure sanitary conditions in the beef boning and product shipping/receiving rooms. 9 CFR 416.2 (b)

e) Gaps at the bottoms and sides of doors in the dry storage room for the packaging materials were not sealed properly to prevent the entry of rodents and other vermin. 9 CFR 416.2 (b)

f) Holes, cracks, and open spaces at the junction of wall and ceilings were observed in the area where exposed packaging materials were handled in the product packaging room. 9 CFR 416.2 (b)

41/51.a) Beaded condensation was observed on ceilings in one carcass chiller and overhead pipes in the slaughter room. 9 CFR 416.2 (d)

b) Dripping water was observed from the ceilings in the beef boning and product shipping rooms. CFR 416.2 (d)

58. Government Of Brazil (GOB) meat inspection officials gave a Notice of Intend to Delist to Establishment SIF 421 regarding the inadequate implementation requirements for Sanitation Standard Operating Procedures (SSOP), Sanitation Performance Standards (SPS), and Government Oversight Enforcement, effective July 12, 2005. GOB inspection official is to evaluate the adequacy of corrective actions and provide a full report to FSIS.

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

Dr. Faizur R. Choudry 07/29/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Friboi Ltda. Barretos, Sao Paulo	2. AUDIT DATE 07/12, 13/05	3. ESTABLISHMENT NO SIF 0076	4. NAME OF COUNTRY Brazil
	5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, DVM	6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	O
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	O
25. General Labeling		53. Animal Identification	O
26. Fin. Prod Standards/Boneless (Defects/AQL/Park Skins/Moisture)		54. Ante Mortem Inspection	O
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	O
27. Written Procedures	O	Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis	O	56. European Community Directives	O
29. Records	O	57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions	O	59.	
31. Reassessment	O		
32. Written Assurance	O		

60. Observation of the Establishment

Establishment # SIF 0076

Date: 07/12,13/2005

Processing Operation

There were no significant findings to report after consideration of the nature, degree and extent of all observations.

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE
Dr. Faizur R. Choudry 07/29/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Frigorifico Bertin Ltda Vila Miisa S/N Ituiutaba, Minas Gerais	2. AUDIT DATE 07/14/05	3. ESTABLISHMENT NO SIF 0504	4. NAME OF COUNTRY BRAZIL
		5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, DVM	6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	X
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	X
13. Daily records document item 10, 11 and 12 above.	X	39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	X	49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Establishment # 504

Date: 07/14/2005

Slaughter & Processing Operation

13/51. The daily pre-operational and operational Sanitation Standard Operating Procedures (SSOP) records did not document the corrective actions properly for identified deficiencies such as: to prevent recurrence of direct product contamination or adulteration of products, including appropriate reevaluation and modification of the SSOP or appropriate improvements in the execution of the SSOP. 9 CFR 416.16

22/51. The monitoring records of critical control points did not include the time, initial or signature. 9 CFR 417.5(b)

38/51. Flies were observed in the slaughter room. 9 CFR 416.2(a)

61. NAME OF AUDITOR

Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

Dr. Faizur R. Choudry 07/29/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Bertin Ltda Rdovia Navirai/Itaquirai, Zona Rural, km 02 Navirai, Moto Grosso do Sul	2. AUDIT DATE 07/18/2005	3. ESTABLISHMENT NO. SIF 3181	4. NAME OF COUNTRY BRAZIL
	5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, DVM.	6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's		37. Import	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	X
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Park Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Establishment # SIF 3181

Date: 07/18/2005

Slaughter/Processing Operation

43/51. Two windows and two air vents on the top of roof were not sealed properly to prevent the entrance of rodents and other vermin in the potable water tank. 9 CFR 416.2 (g)

61. NAME OF AUDITOR

Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

Dr. Faizur R. Choudry 07/29/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Friboi Ltda. Av. Hamilton Simioni s/n Bairro Taboca Araputanga, Moto Grosso (MT)	2. AUDIT DATE 07/19/2005	3. ESTABLISHMENT NO. SIF 2979	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic <i>E. coli</i> Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Establishment # 2979

Date: 07/19/2005

Slaughter & Processing Operations

There were no significant findings to report after consideration of the nature, degree and extent of all observations.

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE
Faizur R. Choudry 07/29/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Bertin Ltda. Rod Go 164 km 167 S/n Zona Rural Mozarlandia Goias	2. AUDIT DATE 07/20/2005	3. ESTABLISHMENT NO SIF 4507	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan .		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Establishment # 4507

Date: 07/20/2005

Slaughter & Processing Operations

39/51. Numerous open spaces at the junction of walls and ceilings were not sealed properly to prevent the entrance of rodents and other vermin in the dry storage room. 9 CFR 416.2 (b)

61. NAME OF AUDITOR
Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE
Faizur R. Choudry 07/29/05

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION Friboi Ltda. Goiania Goias	2. AUDIT DATE 07/21/2005	3. ESTABLISHMENT NO. SIF 0862	4. NAME OF COUNTRY Brazil
5. NAME OF AUDITOR(S) Dr. Faizur R. Choudry, DVM		6. TYPE OF AUDIT <input checked="" type="checkbox"/> ON-SITE AUDIT <input type="checkbox"/> DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results	Part D - Continued Economic Sampling	Audit Results
7. Written SSOP		33. Scheduled Sample	
8. Records documenting implementation.		34. Species Testing	O
9. Signed and dated SSOP, by on-site or overall authority.		35. Residue	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements		Part E - Other Requirements	
10. Implementation of SSOP's, including monitoring of implementation.		36. Export	
11. Maintenance and evaluation of the effectiveness of SSOP's.		37. Import	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.		38. Establishment Grounds and Pest Control	
13. Daily records document item 10, 11 and 12 above.		39. Establishment Construction/Maintenance	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements		40. Light	
14. Developed and implemented a written HACCP plan.		41. Ventilation	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.		42. Plumbing and Sewage	
16. Records documenting implementation and monitoring of the HACCP plan.		43. Water Supply	
17. The HACCP plan is signed and dated by the responsible establishment individual.		44. Dressing Rooms/Lavatories	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements		45. Equipment and Utensils	
18. Monitoring of HACCP plan.		46. Sanitary Operations	
19. Verification and validation of HACCP plan.		47. Employee Hygiene	
20. Corrective action written in HACCP plan.		48. Condemned Product Control	
21. Reassessed adequacy of the HACCP plan.		Part F - Inspection Requirements	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.		49. Government Staffing	
Part C - Economic / Wholesomeness		50. Daily Inspection Coverage	
23. Labeling - Product Standards		51. Enforcement	X
24. Labeling - Net Weights		52. Humane Handling	
25. General Labeling		53. Animal Identification	
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)		54. Ante Mortem Inspection	
Part D - Sampling Generic E. coli Testing		55. Post Mortem Inspection	
27. Written Procedures		Part G - Other Regulatory Oversight Requirements	
28. Sample Collection/Analysis		56. European Community Directives	O
29. Records		57. Monthly Review	X
Salmonella Performance Standards - Basic Requirements		58.	
30. Corrective Actions		59.	
31. Reassessment			
32. Written Assurance			

60. Observation of the Establishment

Establishment # 0862

Date: 07/21/2005

Slaughter & Processing Operations

57/51. On record review, agreed correction dates were not met on timely basis and Government of Brazil inspection officials took no actions to comply on the supervisory monthly reports. 9 CFR 416.17 and 417.8

61. NAME OF AUDITOR

Dr. Faizur R. Choudry, DVM

62. AUDITOR SIGNATURE AND DATE

Dr. Faizur R. Choudry 07/29/05

Informal Translation

**Official Letter Number 101/DIPOA/05
Dated Nov 04, 2005**

Mr. Counselor

I acknowledge receipt of the "FINAL DRAFT of the REPORT OF THE AUDIT CARRIED OUT IN BRAZIL COVERING BRAZIL'S MEAT INSPECTION SYSTEM – July 7 through July 27, 2005 -", forwarded to me by Dr. Sally White, International equivalence Director, FSIS/USDA.

DIPOA, in the last months, carried through several workshops as per Circular Numbers 175/CGPE/DIPOA/2005 and 176/CGPE/DIPOA/2005 with the objective of training employees performing inspection activities at the establishments eligible for the United States. Also, in this period, training courses in microbiology were carried out for employees of private and public laboratories.

**Sincerely
Nelmon Oliveira da Costa
Director DIPOA/SDA/MAPA**

Ilmo. Sr.
Alan Hrapsky
Conselheiro de Assuntos de Agricultura
Embaixada dos Estados Unidos da América
SES – Avenida das Nações. Quadra 801, lote 3
70403-900 Brasília –DF



REPÚBLICA FEDERATIVA DO BRASIL
MINISTÉRIO DA AGRICULTURA, PECUÁRIA E ABASTECIMENTO - MAPA.
SECRETARIA DE DEFESA AGROPECUÁRIA - SDA
DEPARTAMENTO DE INSPEÇÃO DE PRODUTOS DE ORIGEM ANIMAL - DIPOA

Ofício Nº 101/DIPOA/05

Brasília, 04 de novembro de 2005

Senhor Conselheiro,

Apraz-me cumprimentá-lo e ao mesmo acusar o recebido do “*DRAFT FINAL REPORT OF ON AUDIT CARRIED OUT IN BRAZIL COVERING BRAZIL’S MEAT INSPECTION SYSTEM – July 7 through July 27, 2005 -*”, encaminhado pela Sra. Sally White, Diretora de Equivalência Internacional do FSIS/USDA.

O DIPOA, nos últimos meses, realizou vários workshops focalizando as Circulares nºs 175/CGPE/DIPOA/2005 e 176/CGPE/DIPOA/2005 com o objetivo de treinar os funcionários envolvidos nas atividades de inspeção junto aos estabelecimentos habilitados para os Estados Unidos. Também, nesse período, foram realizados cursos de treinamento em microbiologia para os funcionários dos laboratórios oficiais e privados.

Atenciosamente,

Nelmon Oliveira da Costa
Diretor do DIPOA/SDA/MAPA

Ilmo. Sr.
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